



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

July 15, 2009

Ms. Mary C. Erickson, Acting Forest Supervisor
Custer National Forest
1310 Main Street
Billings, MT 59105

Re: CEQ 20090204; Sioux Ranger District Travel
Management Plan FEIS and ROD

Dear Ms. Erickson:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Sioux Ranger District Travel Management Plan, Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We appreciate receipt of responses to EPA's DEIS comments in Chapter 5 of the FEIS. We support the Custer National Forest's selection of Alternative B as the preferred alternative. Alternative B includes more environmentally protective features than the other two alternatives evaluated, no action and Alternative A (i.e., protection of streams, water quality, fisheries, wildlife, etc.), and would have the highest potential reduction in miles of road with reduced water quality/fisheries risk (122 miles vs. 24 miles with Alternative A); beneficial impact to two sensitive aquatic species over Alternative A; lowest mileage of roads with moderate or high erosion hazard (290 miles vs. 439 miles with Alternative A and 373 miles with no action); decrease of 83 miles of motorized routes in areas with moderate or high erosion hazard vs. increase of 65 miles in erosive areas with Alternative A; lowest weed susceptible acres within the designated road corridor 21,874 acres vs. 34,572 acres with Alternative A and 30,604 acres with no action); and results in greater decreases in road density and increases in wildlife core habitat than other alternatives. We also appreciate inclusion of a discussion of wetlands in the FEIS, and are pleased that the District Ranger will develop an implementation and effectiveness monitoring plan within one year of the date of the decision for this project.

We do want to state, however, that we remain concerned about the minimal funding and resources available to properly maintain roads and keep them in fair to good condition to minimize erosion and water quality and fisheries impacts. Only a small percentage of roads on the District receive annual maintenance, and the FEIS states that funding for maintenance of roads and trails is not anticipated to change significantly in the next 10 years. Accordingly, there is unlikely to be sufficient funding to maintain to standard all of the routes necessary for the administration, utilization, and protection of the District for the foreseeable future.

We believe it is important to provide adequate funding to properly maintain roads, and particularly to implement BMPs needed to address water quality effects of roads. There should be a continuing road inspection, evaluation and maintenance program in place to identify road drainage and BMP needs, and adequate funds to correct road deficiencies. We encourage provision of improved funding for road maintenance and emphasize the need for decommissioning of roads which cause resource damages and which cannot be adequately maintained. We believe road networks should be limited to those that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities. This is the only way to protect and sustain resources and ecosystems for use by future generations given a situation with inadequate funding to maintain the road/trail system.

We also want to state that policing and enforcement of travel restrictions is necessary to promote compliance, and ensure protection of water quality, fisheries, wildlife, and other sensitive resources. We agree that having understandable travel maps (Motor Vehicle Use Map, MVUM), and clearer travel management rules for the public, is likely to improve voluntary compliance with the travel plan. It is also important that adequate resources be devoted to policing and enforcement to assure compliance with travel management rules. We support adding law enforcement personnel to handle the increases in motor vehicle uses that are occurring on the District.

We thank for the opportunity to review and provide comments on the Travel Management Plan and EIS during the NEPA process. If you have any questions regarding our input please contact Mr. Stephen Potts of my staff in Helena at (406) 457-5022 or in Missoula at (406) 329-3313, or via e-mail at potts.stephen@epa.gov.

Sincerely,

John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA, 8EPR-N, Denver